

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

In re:	§
	§ Chapter 7
A+ PRO RECOVERY AND TOWING LLC	§
	§ Case No. 22-10132
Debtor.	§

---

**TRUSTEE'S NOTICE OF INTENT TO CONDUCT A RULE 2004 EXAMINATION**

---

To: Castine McIlHargey, 2216 Padre Blvd, Ste B 158, South Padre Island, TX 78597-0204

**PLEASE TAKE NOTICE** that Catherine Curtis (the “**Trustee**”), the chapter 7 trustee for the estate of A+ Pro Recovery and Towing LLC (the “**Debtor**”), files this *Notice of Intent to Conduct a Rule 2004 Examination* (the “**Notice**”).

**PLEASE TAKE FURTHER NOTICE** this Notice was filed on February 20, 2023 and that per Fed. R. Bankr. P. 2004 and the Southern District of Texas’ Local Bankruptcy Rule 2004-1, 14-days’ notice must be given to A+ Pro Companies, LLC.

**PLEASE TAKE FURTHER NOTICE** that Castine McIlhargey is to direct its response to Trustee’s counsel, J. Maxwell Beatty, The Beatty Law Firm PC, at 1127 Eldridge Pkwy, Suite 300 #383, Houston, Texas 77077 or via email at [max@beattypc.com](mailto:max@beattypc.com).

**PLEASE TAKE FURTHER NOTICE** if Castine McIlhargey does not serve a response, then the notice to conduct an examination is deemed ordered without require the entry of an order by the Court.

**PLEASE TAKE FURTHER NOTICE** that after the 14-day notice period, the Trustee will serve **Exhibit 1** upon Castine McIlhargey seeking the production of certain documents identified in **Exhibit 1**.

Date: February 20, 2023

**THE BEATTY LAW FIRM PC**

By: /s/ J. Maxwell Beatty  
J. Maxwell Beatty  
State Bar No. 24051740  
[max@beattypc.com](mailto:max@beattypc.com)  
1127 Eldridge Pkwy  
Suite 300, #383  
Houston, Texas 77077  
Tel. 832-529-3381  
Fax. 832-852-1266  
*Counsel for the Chapter 7 Trustee*

**CERTIFICATE OF CONFERENCE**

I certify that, on February 15, 2023, I attempted to confer with Castine McIlhargey regarding a reasonable examination schedule, including the dates for production, by sending an email to all known email addresses for her. Ms. McIlhargey did not respond.

/s/ J. Maxwell Beatty  
J. Maxwell Beatty

**CERTIFICATE OF SERVICE**

I certify that, on February 20, 2023, a true and correct copy of this *Notice of Intent to Conduct a Rule 2004 Examination* was served upon all parties who have requested electronic notice through the Court's ECF system. In addition, a copy was served via U.S. Mail and via email as follows:

Castine McIlHargey  
2216 Padre Blvd, Ste B 158  
South Padre Island, TX 78597-0204  
[castine@spi-tow.com](mailto:castine@spi-tow.com)  
[castine.mcintyre@gmail.com](mailto:castine.mcintyre@gmail.com)

/s/ J. Maxwell Beatty  
J. Maxwell Beatty